REMARKS

This response is submitted in response to the Final Office Action dated October 17, 2007. Claims 1, 25, 41, 54 and 55 are amended, and claim 53 is cancelled without prejudice. Claim 61 is newly presented. No new matter is added. Claims 1-4, 6-59 and 61 are active for examination.

The Office Action rejected claims 1-4 and 6-59 under 35 U.S.C. §102(e) as being anticipated by Yaung et al. (U.S. Patent No. 6,446,069). By this response, independent claims 1, 25 and 41 is amended. Appropriate support for the amendment can be found in, for example, the original claims 53, 33 and 34.

The anticipation rejection is respectfully overcome because Yaung fails to disclose every limitation of the claims.

An exemplary system according to claim 1 interfaces between a plurality of software applications and a plurality of users, and applies <u>unique hierarchical security guards</u> to **both** (1) functions of software applications and (2) data that access by users are to be guarded and controlled. In response to an input from one of the users to a particular one of the software applications, the exemplary system provides instructions to the particular software application regarding entitlements of the one of the plurality of users to access a particular function of the particular software application. The exemplary system includes a **memory** that <u>stores data</u> specifically <u>identifying</u> and <u>keeping record</u> of <u>hierarchically arranged functions associated with each software application</u>. <u>An entitlement of the one of the plurality of users to one of the hierarchically arranged functions automatically applies to functions that are **hierarchically subordinate** to the one of the plurality of hierarchically arranged functions, according to the respective first data stored in the first memory</u>. The one of the users is an organization having

associated proprietary data and the second data includes <u>an assigned access level to access the</u> <u>proprietary data by an individual user</u> within the organization. The assigned access level is selected from among a plurality of access levels arranged in <u>a hierarchical structure</u> and specifies an authorization to access at least part of the proprietary data associated with the organization. <u>The assigned access level allows access to all data accessible to all access levels hierarchically</u> <u>subordinate to the assigned access level.</u> <u>When the individual user utilizes one of the software</u> <u>applications to process the proprietary data, the assigned access level of the individual user and</u> <u>an assigned entitlement of the individual user to one of the hierarchically arranged functions</u> **determine available functions of the one of the software applications and available** **proprietary data to the individual user.** These features are unavailable in Yaung.

While Yaung purportedly describes the use of an application-specific definition vector (DV), these DVs are used to define how a USER can access <u>a specific application</u> ("Each defined privilege corresponds to a certain type of function to be performed with a pre-determined type of data item in the digital library. As will be discussed, only a user utilizing the application who is associated with the privilege can thereby gain access to the function and perform the function on the data item.") See col. 7, line 35 to line 59 of Yaung. Apparently, the stored DV is used to define how a user can access an application, but Yaung **fails** to specifically describe applying <u>a dual hierarchical safeguard</u> on **both** (1) **functions of software applications** and (2) **data** <u>that access by users are to be guarded and controlled,</u> such that <u>an entitlement of a user to</u> <u>one of</u> **the hierarchically arranged functions automatically** applies to functions that are **hierarchically subordinate** to the one of the plurality of **hierarchically arranged functions,** and **an entitlement of access the hierarchically arranged data** automatically grants access to <u>all the data that are hierarchically subordinate to the level granted to the user,</u> as specified by the

second data. Yaung does not describe that when the individual user utilizes one of the software applications to process the proprietary data, the assigned access level of the individual user and an assigned entitlement of the individual user to one of the hierarchically arranged functions **determine available functions of the one of the software applications and available proprietary data to the individual user**.

Accordingly, Yaung fails to disclose that "the first memory stores the respective first data for each software application including an identification of hierarchically arranged functions associated with that software application, an entitlement of the one of the plurality of users to one of the hierarchically arranged functions automatically applies to functions that are hierarchically subordinate to the one of the plurality of hierarchically arranged functions, according to the respective first data stored in the first memory; the one of the users is an organization having associated proprietary data; the second data includes an assigned access level to access the proprietary data by an individual user within the organization, wherein the assigned access level is selected from among a plurality of access levels arranged in a hierarchical structure, and specifies an authorization to access at least part of the proprietary data associated with the organization; the assigned access level allows access to all data accessible to all access levels hierarchically subordinate to the assigned access level; and when the individual user utilizes one of the software applications to process the proprietary data, the assigned access level of the individual user and an assigned entitlement of the individual user to one of the hierarchically arranged functions determine available functions of the one of the software applications and available proprietary data to the individual user," as described in claim 1.

As Yaung fails to meet every limitation of claim 1, Yaung cannot support a prima facie case of anticipation. Accordingly, the anticipation rejection of claim is overcome. Favorable reconsideration of claim 1 is respectfully solicited.

Claims 25 and 41 include language comparable to that of claim 1. Accordingly, claims 25 and 41 is patentable over Yaung for at least the same reasons as for claim 1.

Claims 1-4, 6-24, 26-40, 42-52 and 54-59, directly or indirectly, depend on claims 1 and 25, respectively, and incorporate every limitation thereof. Consequently, claims 1-4, 6-24, 26-40, 42-52 and 54-59 are patentable over Yaung by virtue of their dependencies.

New claim 61 depends on claim 1 and further describes that an auditing application, such as application 118 described in the written descriptions, for providing security auditing. Appropriate support can be found in, for instance, Figs. 1 and 13 and page 18, third paragraph. It is believed that these features are not disclosed in Yaung. Accordingly, claim 61 is patentable over Yaung for at least the same reasons as for claim 1 as well as based on its own merits.

CONCLUSION

Applicants believe that this application is in condition for allowance, and request that the Examiner give the application favorable reconsideration and permit it to issue as a patent. If the Examiner believes that the application can be put in even better condition for allowance, the Examiner is invited to contact Applicants' representatives listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper,

including extension of time fees, to Deposit Account 500417 and please credit any excess fees to

such deposit account.

Respectfully submitted,

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